

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., et al.,¹

Debtors.

Chapter 11

Case No. 01-1139 (JKF)

Jointly Administered

Re: Docket Nos. 26238

**JOINDER OF HER MAJESTY THE QUEEN IN RIGHT OF CANADA TO THE
PRECAUTIONARY MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS
TO OR APPEAL FROM MEMORANDUM OPINION AND RECOMMENDED
FINDINGS OF FACT AND CONCLUSIONS OF LAW OF BANKRUPTCY JUDGE**

Her Majesty the Queen in Right of Canada (the “Crown”), by and through her undersigned counsel, hereby joins the Precautionary Motion for Extension of Time to File Objections to or Appeal from Memorandum Opinion and Recommended Findings of Fact and

¹ The Debtors are the following entities: W.R. Grace & Co. (f/k/a Grace Specialty Chemicals Inc.), W.R. Grace & Co.-Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food ‘N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), ECARG, Inc., Five Alewife Boston Ltd., GC Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), GC Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W.R. Grace Capital Corporation, W.R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, LB Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc. E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

Conclusions of Law of Bankruptcy Judge (Docket No. 26238) (the “Motion”), to the extent that it requests an extension of the deadline to object to the Memorandum Opinion Regarding Objections to Confirmation of First Amended Joint Plan of Reorganization and Recommended Supplemental Findings of Fact and Conclusions of Law (Docket No. 26154) (the “Memorandum Opinion”) and the Recommended Findings of Fact, Conclusions of Law and Order Regarding Confirmation of First Amended Joint Plan of Reorganization as Modified Through December 23, 2010 (Docket No. 26155) (the “Proposed Order”) until February 28, 2011, pursuant to Rule 9033(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and in support states as follows:

1. On January 12, 2010, the Crown filed the Objections of Her Majesty the Queen in Right of Canada to Confirmation of the First Amended Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code of W.R. Grace & Co., et al., the Official Committee of Asbestos Personal Injury Claimants, the Asbestos PI Future Claimants’ Representative, and the Official Committee of Equity Security Holders Dated February 3, 2009 (Docket No. 24144) (the “Objection”).

2. In the Objection, the Crown maintained that the Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code of W.R. Grace & Co., et al., the Official Committee of Asbestos Personal Injury Claimants, the Asbestos PI Future Claimants’ Representative, and the Official Committee of Equity Security Holders (as such plan has been or may be amended, supplemented, or modified) (the “Plan”) is not confirmable.

3. On January 31, 2011, the Court docketed the Memorandum Opinion and the Proposed Order.

4. The Crown agrees with the legal arguments and assertions set forth in the Motion with respect to the request for an extension of the deadline to assert objections to the Memorandum Opinion and Proposed Order until February 28, 2011, pursuant to Bankruptcy Rule 9033(c), and hereby joins the Motion with respect to such request. The Crown reserves the right to present arguments at any hearing on the Motion.

WHEREFORE, for the reasons set forth in the Motion, the Crown respectfully requests an extension of the deadline by which the Crown may assert objections to the Memorandum Opinion and Proposed Order until February 28, 2011, pursuant to Bankruptcy Rule 9033(c), and that the Court grant the Crown such other and further relief as it deems just and proper.

Dated: February 11, 2011

Respectfully submitted,

Womble Carlyle Sandridge & Rice, PLLC

By: /s/ Matthew P. Ward
Francis A. Monaco, Jr. (#2078)
Kevin J. Mangan (#3810)
Matthew P. Ward (#4471)
222 Delaware Avenue, Suite 1501
Wilmington, DE 19801
Ph: (302) 252-4320
Fax: (302) 252-4330

-and-

Jacqueline Dais-Visca
Senior Counsel
Business Law Section
Ontario Regional Office
Suite 3400, Box 34, The Exchange Tower
130 King Street West, Toronto, Ontario
M5X 1K6

Counsel for Her Majesty the Queen in Right of
Canada as represented by the Attorney General of
Canada